

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
MARY BLY, MICHAEL CONNELLY, SYLVIA
DAY, JONATHAN FRANZEN, JOHN
GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA
SHANBHAG LANG, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA ROBINSON,
GEORGE SAUNDERS, SCOTT TUROW, and
RACHEL VAIL, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI
GP LLC, OPENAI, LLC, OPENAI GLOBAL
LLC, OAI CORPORATION LLC, OPENAI
HOLDINGS LLC, OPENAI STARTUP FUND I
LP, OPENAI STARTUP FUND GP I LLC,
OPENAI STARTUP FUND MANAGEMENT
LLC, and MICROSOFT CORPORATION,

Defendants.

Case No. 1:23-cv-08292-SHS

JONATHAN ALTER, KAI BIRD, TAYLOR
BRANCH, RICH COHEN, EUGENE LINDEN,
DANIEL OKRENT, JULIAN SANCTON,
HAMPTON SIDES, STACY SCHIFF, JAMES
SHAPIRO, JIA TOLENTINO, and SIMON
WINCHESTER, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI OPCO LLC, OPENAI
GP, LLC, OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI HOLDINGS,
LLC, OPENAI STARTUP FUND I LP, OPENAI
STARTUP FUND GP I LLC, OPENAI
STARTUP FUND MANAGEMENT LLC, and
MICROSOFT CORPORATION,

Defendants.

Case No. 1:23-cv-10211-SHS

**AFFIDAVIT IN SUPPORT OF MOTION FOR
ADMISSION OF ATTORNEY PRO HAC VICE**

Jordan W. Connors, declares:

1. I am a Partner with the law firm of Susman Godfrey L.L.P.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the State Bar of Washington.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have never been convicted of a felony.
6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
7. My attorney registration number for the Washington State Bar is 41649.
8. Wherefore, your declarant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-10211 for Plaintiff (Julian Sancton).

I, Jordan W. Connors, declare under penalty of perjury that the foregoing is true and correct.

Dated: October 21, 2024


Respectfully Submitted,


Jordan W. Connors
State Bar of Washington, No. 41649
SUSMAN GODFREY L.L.P.
401 Union Street, Suite 3000
Seattle, WA 98101
Tel.: (206) 516-3880
jconnors@susmangodfrey.com

*Attorney for Plaintiffs and the Proposed Fiction and
Nonfiction Author Classes*

SWORN TO and SUBSCRIBED before me by Jordan W. Connors on October 21, 2024.




Notary Public

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)	BAR NO. 41649
)	
OF)	CERTIFICATE
)	
JORDAN CONNORS)	OF
)	
TO PRACTICE IN THE COURTS OF THIS STATE)	GOOD STANDING
)	

I, Sarah R. Pendleton, Acting Clerk of the Supreme Court of the State of Washington, hereby certify

JORDAN CONNORS

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on October 19, 2009, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of this Court on the 17th day of October, 2024.

A handwritten signature in black ink, appearing to read "Sarah R. Pendleton", is written over a faint, larger version of the same signature.

Sarah R. Pendleton
Acting Supreme Court Clerk
Washington State Supreme Court